



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 29, 2023

VIA CM/ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Lawrence Billimek*, 22 Cr. 675 (PGG)

Dear Judge Gardephe,

We write on behalf of the parties regarding the above-referenced matter. Defense motions are currently due on October 3, 2023. (Dkts. 38, 39). The parties remain engaged in ongoing discussions of a pretrial disposition of this matter, but do not anticipate that those discussions will be completed by October 3. Thus, the parties jointly and respectfully request that the Court adjourn the motion deadline for an additional 3 weeks, until October 24, 2023, and anticipate that they will complete discussions regarding a pretrial resolution in advance of that date.

If the Court grants the adjournment request, the parties agree that the Court should exclude time in the interests of justice under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) through the date of the new conference, to allow the defendant to continue contemplating potential motion practice and for the parties to complete their discussions regarding a potential pretrial disposition of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
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